

EXHIBIT 1

FILED
TARRANT COUNTY

NO. 360-479099-10

2023 JUN -8 PM 2:40

IN THE MATTER OF
THE MARRIAGE OF

LARRY E. DICKERSON
AND
KATHLEEN J. DICKERSON

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IN THE DISTRICT COURT

360TH JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

THOMAS A. WILDER
DISTRICT CLERK

**OBJECTION TO MOTION TO RELEASE ADDITIONAL
FUNDS FOR ATTORNEY'S FEES**

COMES NOW, Intervenor, Sheldon I. Goldstein, and requests that this Court **DENY** Larry Dickerson's motion to order the release of funds in the possession and control of Kerry Owens from the remaining funds disbursed from the American Airlines SuperSaver 401(k) Plan in the name of Larry E. Dickerson for payment of attorney's fees to Cordell & Cordell, P.C.

Sheldon I. Goldstein requests that this Court **DENY** Larry E. Dickerson's request for this Court to order \$30,000.00 be released from the remaining funds disbursed from the American Airlines SuperSaver 401(k) held in the possession and control of Kerry Owens.

Sheldon I. Goldstein requests that this Court **DENY** Larry E. Dickerson's request for this Court to order the requested funds to be deposited into the Cordell & Cordell, P.C. trust account for disbursement of existing attorney's fees owed to Cordell & Cordell, P.C.

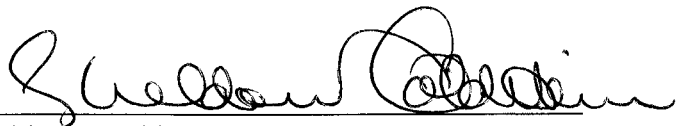
Intervenor, Sheldon I. Goldstein, is owed in excess of \$50,000.00 in attorney fees and has a valid claim pending before this Court for adjudication. Intervenor respectfully requests this Court to **DECLINE** to disburse any further funds from the remaining funds in the American Airlines SuperSaver 401(k) Plan in the name of Larry E. Dickerson until the requests pending before this Court have been heard on the issue of attorney fees.

Intervenor, Sheldon I. Goldstein, asks this Court to consider ordering the remaining funds disbursed from the American Airlines SuperSaver 401(k) held in the possession and control of Kerry Owens to be paid into the registry of the Court until the requests pending before this Court have been heard on the issue of attorney fees.

Sheldon I. Goldstein prays that this Court deny Larry E. Dickerson's Motion to Release Additional Funds for Attorney's Fees and, after hearing, direct the remaining funds from the American Airlines SuperSaver 401(k) be deposited into the registry of the Court for safekeeping.

Respectfully submitted,

Goldstein & Scopellite, PC
2515 Thomas Avenue
Dallas, Texas 75201
Tel: (214) 351-9100
Fax: (214) 351-2889

By: 
Sheldon I. Goldstein
State Bar No. 24036650
Attorney for Kathleen J. Dickerson

Notice of Hearing

The above motion is set for hearing on _____ at _____
_____.m. in the 360th District Court, Tarrant County Family Law
Center, 200 East Weatherford Street, Fort Worth, Texas 76196.

SIGNED on _____.

Judge or Clerk

Certificate of Service

I certify that a true copy of the above was served on each attorney of record or party in
accordance with the Texas Rules of Civil Procedure on June 6, 2012:

Via Fax 817.806.0067

Samuel M. Sanchez

Via Fax 817.274.5175

Kerry Owens

Via Fax 817.847.5262

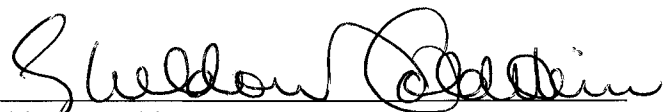
Paul Enlow

Via Fax 817.868.1290

R. Kevin Spencer

Via Fax 817.861.2775

Lori DeAngelis


Sheldon I. Goldstein, Intervenor

2515 Thomas Avenue
Dallas, Texas 75201
Telephone: 214-351-9100
Facsimile: 214-351-2889
www.LawyersDallas.com

Goldstein
&
Scopellite, PC
ATTORNEYS AT LAW
A PROFESSIONAL CORPORATION

6
4 June 2012

Sheldon I. Goldstein *
Michelle J. Scopellite *
Teresa G. Sanchez
Joel B. Mitchell +
+ Of Counsel
+ Certified By the Texas
Board of Legal
Specialization in
Residential Real Estate
Commercial Real Estate
Farm & Ranch Real Est.
Family Law (In.)
Civil Litigation (In.)
* AILA Approved Attorney

Via CMRRR 7011 1570 0000 7276 9757

Clerk
360th District Court
Tarrant County Family Law Center
200 East Weatherford Street
Fort Worth, Texas 76196

**RE: In the Matter of the Marriage of Dickerson, Cause No. 360-479099-10; in the
360th District Court, Tarrant County Texas**

Dear Clerk:

Please find enclosed our *Objection to Motion to Release Additional Funds for Attorney's Fees*. Please file mark the original and place it with the court's papers. Further, please return a file marked copy of the objection to my office in the self addressed stamped envelope provided for your convenience.

Thank you for your attention to this matter.

Sincerely,



Sheldon I. Goldstein

cc:

Via Fax 817.806.0067
Samuel M. Sanchez

Via Fax 817.274.5175
Kerry Owens

Via Fax 817.847.5262
Paul Enlow

FILED
TARRANT COUNTY
JUN -8 PM 2:40
CLERK
AS A. WILDER

Via Fax 817.868.1290
R. Kevin Spencer

Via Fax 817.861.2775
Lori DeAngelis

Goldstein & Scopellite, PC

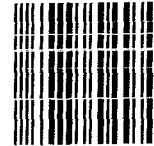
ATTORNEYS AT LAW
A PROFESSIONAL CORPORATION
2515 THOMAS AVENUE
DALLAS, TEXAS 75201



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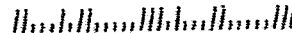
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Clerk
360th District Court
Tarrant County Family Law Center
200 East Weatherford Street
Fort Worth, Texas 76196

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TARRANT COUNTY

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THOMAS A. WILDER
CLERK



NO. 360-479099-10

**IN THE MATTER OF
THE MARRIAGE OF**

**LARRY E. DICKERSON
AND
KATHLEEN J. DICKERSON**

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IN THE DISTRICT COURT

360TH JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

ORDER FOR DISBURSEMENT OF FUNDS FROM RECEIVER

On _____ the Court heard Petitioner and Respondent's joint request for Disbursement of Funds from trust amounts held by receiver, Kerry Owens.

Appearances

Petitioner, LARRY E. DICKERSON, did not appear in person but appeared through attorney of record, Samuel M. Sanchez, and announced ready.

Respondent, KATHLEEN J. DICKERSON, did not appear in person but through attorney of record, John Gruener, and announced ready.

Property and Parties

The Court finds that the following orders respecting the property and parties are necessary and equitable. IT IS ORDERED that receiver KERRY OWENS shall be authorized to liquidate \$6000.00 from funds currently in his possession and underneath the Court's control for the following specific purposes and in the following specific manners:

1. \$3,000.00 is to be disbursed directly to Samuel M. Sanchez attorney for Larry Dickerson. Upon disbursement of said funds, the proceeds shall be used to pay the agreed upon Arbitrator Judge Paul Davis for the costs associated with conducting the arbitration scheduled on December 8, 2012.

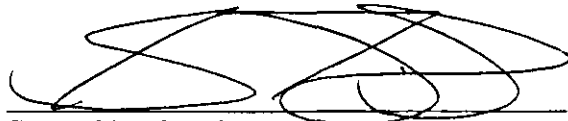
2. \$3,000.00 is to be disbursed directly to John Gruener attorney for Kathleen Dickerson. Upon disbursement of said funds, the proceeds shall be used to pay the agreed upon Arbitrator, Judge Paul Davis, for the fees and costs associated with conducting the arbitration scheduled on December 8, 2012.

SIGNED on

December 3, 2012


JUDGE PRESIDING

AGREED AS TO FORM ONLY:



Samuel M. Sanchez
Texas State Bar No. 24045241
Cordell & Cordell, P.C.
420 Throckmorton St., Suite 1010
Fort Worth, Texas 76102
(817) 806-0066
(817) 806-0067 Fax
Attorney for Larry Dickerson

John Gruener
Texas State Bar No. 084560900
Law Offices of John Gruener, P.C.
1450 Hughes Road, Suite 215
Grapevine, Texas 76051
(817) 329-1155
(817) 488-4998 Fax

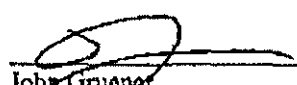
2. \$3,000.00 is to be disbursed directly to John Gruener attorney for Kathleen Dickerson. Upon disbursement of said funds, the proceeds shall be used to pay the agreed upon Arbitrator, Judge Paul Davis, for the fees and costs associated with conducting the arbitration scheduled on December 8, 2012.

SIGNED on _____.

JUDGE PRESIDING

AGREED AS TO FORM ONLY:

Samuel M. Sanchez
Texas State Bar No. 24045241
Cordell & Cordell, P.C.
420 Throckmorton St., Suite 1010
Fort Worth, Texas 76102
(817) 806-0066
(817) 806-0067 Fax
Attorney for Larry Dickerson



John Gruener
Texas State Bar No. 084560900
Law Offices of John Gruener, P.C.
1450 Hughes Road, Suite 215
Grapevine, Texas 76051
(817) 329-1155
(817) 488-4998 Fax

CAUSE NO. 360-479099-10

IN THE MATTER OF
THE MARRIAGE OF

LARRY E. DICKERSON
AND
KATHLEEN J. DICKERSON

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IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

360TH JUDICIAL DISTRICT

**ORDER TO WITHDRAW AMERICAN AIRLINES
SUPER SAVER 401K PLAN**

On this day the Court ORDERS court appointed receiver, KERRY L. OWENS to withdraw sixty one thousand seven hundred dollars (\$61,700.00) from the funds held in the American Airlines Super Saver 401K Plan, Employee ID # 00581935 in the name of LARRY DICKERSON. All funds requested shall be paid to KERRY L.OWENS, Receiver and mailed to 720 W. Abram, Arlington, TX 76013.

The Court ORDERS 25% tax withholding be withheld upon distribution and any future income tax liability shall be the responsibility of LARRY DICKERSON and KATHLEEN DICKERSON.

Signed this 5 day of January, 2012.


JUDGE PRESIDING

APPROVED AS TO FORM AND SUBSTANCE:

Paul Enlow
Texas State Bar No. 06629050
P.O. Box 136057
Ft. Worth, TX 76136
817-847-5261
817-847-5262 Fax

Attorney for Kathleen Dickerson

Sam Sanchez
Texas State Bar No. 24045241
420 Throckmorton ,Suite 1010
Ft. Worth, TX 76102
817-806-0066
817-806-0067 Fax

Attorney for Larry Dickerson

ORDER TO WITHDRAW FUNDS FROM METLIFE IRA
De La Mora Recievership

Page 1 of 1

COURT'S MINUTES
TRANSACTION #

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CAUSE NO. 360-479099-10

IN THE MATTER OF
THE MARRIAGE OF§
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IN THE DISTRICT COURT

LARRY E. DICKERSON
AND
KATHLEEN J. DICKERSONTARRANT COUNTY, TEXAS

360TH JUDICIAL DISTRICTORDER TO WITHDRAW AMERICAN AIRLINES
SUPER SAVER 401K PLAN

On this day the Court ORDERS court appointed receiver, KERRY L. OWENS to withdraw sixty one thousand seven hundred dollars (\$61,700.00) from the funds held in the American Airlines Super Saver 401K Plan, Employee ID # 00581935 in the name of LARRY DICKERSON. All funds requested shall be paid to KERRY L. OWENS, Receiver and mailed to 720 W. Abram, Arlington, TX 76013.

The Court ORDERS 25% tax withholding be withheld upon distribution and any future income tax liability shall be the responsibility of LARRY DICKERSON and KATHLEEN DICKERSON.

Signed this _____ day of _____, 20_____.

JUDGE PRESIDING

APPROVED AS TO FORM AND SUBSTANCE:

Paul Enlow
Texas State Bar No. 06629050
P.O. Box 136057
Ft. Worth, TX 76136
817-847-5261
817-847-5262 Fax

Attorney for Kathleen Dickerson

Sam Sanchez
Texas State Bar No. 24045241
420 Throckmorton, Suite 1010
Ft. Worth, TX 76102
817-806-0066
817-806-0067 Fax

Attorney for Larry Dickerson

CAUSE NO. 360-479099-10

IN THE MATTER OF
THE MARRIAGE OF

LARRY E. DICKERSON
AND
KATHLEEN J. DICKERSON

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IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

360TH JUDICIAL DISTRICT

**ORDER TO WITHDRAW AMERICAN AIRLINES
SUPER SAVER 401K PLAN**

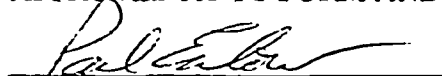
On this day the Court ORDERS court appointed receiver, KERRY L. OWENS to withdraw sixty one thousand seven hundred dollars (\$61,700.00) from the funds held in the American Airlines Super Saver 401K Plan, Employee ID # 00581935 in the name of LARRY DICKERSON. All funds requested shall be paid to KERRY L. OWENS, Receiver and mailed to 720 W. Abram, Arlington, TX 76013.

The Court ORDERS 25% tax withholding be withheld upon distribution and any future income tax liability shall be the responsibility of LARRY DICKERSON and KATHLEEN DICKERSON.

Signed this ____ day of _____, 20____.

JUDGE PRESIDING

APPROVED AS TO FORM AND SUBSTANCE:



Paul Enlow
Texas State Bar No. 06629050
P.O. Box 136057
Ft. Worth, TX 76136
817-847-5261
817-847-5262 Fax

Attorney for Kathleen Dickerson

Sam Sanchez
Texas State Bar No. 24045241
420 Throckmorton, Suite 1010
Ft. Worth, TX 76102
817-806-0066
817-806-0067 Fax

Attorney for Larry Dickerson

ORIGINAL

CAUSE NO. 360-479099-10

IN THE MATTER OF
THE MARRIAGE OFLARRY E. DICKERSON
AND
KATHLEEN J. DICKERSON§
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IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

360TH JUDICIAL DISTRICTORDER CONFIRMING PAYMENTS FROM 401KOn this 8 day of May, 2012, the Court finds as follows:

Notice has been issued and served as required by law, over the objections of both parties to the Order Confirming Payments from 401K pursuant to the Orders for Disbursement of Funds from 401k signed on March 23, 2012 with the addition of the payment of Mr. Kerry Owens attorney's fees and future payment of attorneys fees of Mr. Paul Enlow, as referenced in this order.

Pursuant to the Court's Order dated March 23, 2012 and heard on November 29, 2011, the following was ordered and Mr. Owens shall immediately comply upon the funds becoming available:


1. 100% of the proceeds from the 401k shall be surrendered to Kerry Owens;
2. \$10,000 to be paid by Kerry Owens, directly into the trust account of Kathleen Dickerson's attorney, Paul Endow for future costs and fees.
3. \$7,500 to be paid directly into the trust account of Larry Dickersons attorney, Sam Sanchez for past attorneys fees owed, and an additional \$10,000 is to be paid into the trust account of Samuel Sanchez for future costs and fees. Total amounts to be paid to the trust account of Samuel Sanchez thereby totaling \$17,500.
4. \$18,750 to be paid by Mr. Owens, directly to AOPA Visa Signature Credit card ending in 2206 currently in possession of Larry Dickerson.

In addition to the Order dated March 23, 2012, the following is ORDERED:

1. Kathleen Dickerson's attorney, Paul Enlow shall be paid an additional \$7,500 to be placed in his trust account for future attorney fees.
2. The court finds that Kerry Owens has spent 33.3 hours on this matter and incurred expenses in the amount of \$78.10. The Court finds that the time expended and expenses advanced are reasonable and just and should be paid. IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED that the attorney's fees and expenses of KERRY OWENS should be paid to the aforementioned Special Master in the amount of \$6,775.60 and that such fees and expenses shall be paid within thirty days from the date of such Order from the 401k funds.

IT IS ORDERED all remaining proceeds are to remain in the possession and control of Special Master, Kerry Owens for future order and division by the Court.

SIGNED this 8 day of May, 2012.



JUDGE PRESIDING

Approved as to Form:



154173244

)	CASE NO. 322-547540-13	322 Judicial Court Tarrant
)		County Texas
Brian P Schneider)		100 West Weatherford St
)	QUALIFIED	Fort Worth
and)	DOMESTIC	TX 76102
)	RELATIONS ORDER	
Kristi Ann Schneider)		
NKA- Kristi Ann Taylor)		

WHEREAS, this Court has jurisdiction over the parties and the subject matter of this Order; and

WHEREAS, the parties and the Court intend that this Order shall be a Qualified Domestic Relations Order (hereinafter referred to as a "QDRO") as defined in Section 206(d)(3) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA") and Section 414(p) of the Internal Revenue Code of 1986, as amended; and,

WHEREAS, pursuant to the referenced statutes, the Plan Administrator shall make a determination of the qualified status of this Order; and

WHEREAS, following approval by the Plan Administrator, this Order shall constitute a Qualified Domestic Relations Order; and

WHEREAS, the parties have stipulated that the Court enter this Order;

NOW, THEREFORE, pursuant to this state's Domestic Relations Laws, IT IS HEREBY ORDERED BY THE COURT as follows:

1. As used in this Order, the following terms shall apply:
 - (a) "Participant" shall mean Brian P Schneider, whose current address is 5332 Camrose St, Keller, TX 76244.
 - (b) "Alternate Payee" shall mean Kristi Ann Schneider, whose current address is 1144 Kachina Lane, Haslet, TX 76052
 - (c) "Plan" shall mean Microsoft Corporation Savings Plus 401(k) Plan.
2. The Order relates to marital property rights
3. The date of marriage was 03/11/2005.
4. The date of legal separation or divorce is 07/11/2014.
5. The Alternate Payee is the former spouse of the Participant.
6. With respect to marital property, alimony and spousal awards, the Participant and the Alternate Payee are/were married for federal income tax purposes.

CF
Court's Minutes
Transaction # 70

7. The Alternate Payee's award will be calculated as of the date of this Domestic Relations Order. The date of the Order shall hereinafter be referred to as the "Valuation Date".
8. The Alternate Payee's interest in the Plan shall be \$32,261.65 of the Participant's total vested account balance under the Plan as of the Valuation Date.
9. The Alternate Payee's award is not entitled to earnings (dividends, interest, gains and losses) from the Valuation Date to the date that the award is segregated from the Participant's account. From and after the date of segregation, the Alternate Payee's award shall be held in an account under the Plan and shall be entitled to all earnings attributable to the investments therein.
10. In the event there is an outstanding loan balance as of the Valuation Date, the loan balance will not be included for purposes of calculating the account balance to be divided.
11. The Alternate Payee's award will be paid proportionately from all standard plan investment options in which the Participant's account is invested (not including the Brokerage Link account). In the event that the Participant has a Brokerage Link account and there are insufficient funds in the standard plan investment options in the Participant's account to satisfy the Alternate Payee's award, the Participant is hereby ORDERED to immediately transfer sufficient funds from the Brokerage Link account to the standard plan investment options to satisfy the Alternate Payee's award.
12. The Alternate Payee's interest in the Plan shall be payable to the Alternate Payee in a lump sum distribution, as soon as administratively feasible following the date that the Order is determined to be a QDRO. The Alternate Payee shall initiate the distribution in accordance with the terms of the Plan and the administrative procedures that have been established by the Plan Administrator. The amount distributed to the Alternate Payee will be based on the value of the Alternate Payee's account on the date the distribution is processed.
13. The Alternate Payee will have the right to designate a beneficiary. In the event that the Alternate Payee dies without designating a beneficiary, or if the beneficiary predeceases the Alternate Payee, the Alternate Payee's award will be paid to the Alternate Payee's estate. All beneficiary designations must be made after qualification of the Order and segregation of a separate account for the Alternate Payee pursuant to the administrative procedures established for the Plan and cannot be accepted in the Order.
14. Neither Party shall accept any benefits from the Plan which are the property of the other Party. In the event that the Plan Administrator inadvertently pays to the Participant any benefits that are assigned to the Alternate Payee pursuant to the terms of this Order, the Participant shall forthwith return such benefits to the Plan. In the event that the Plan Administrator inadvertently pays to the Alternate Payee any benefits that are not assigned to the Alternate Payee pursuant to the terms of this Order, the Alternate Payee shall forthwith return such benefits to the Plan.

15. The Alternate Payee is responsible for the one time determination fee for review of the Domestic Relations Order. The fee will be deducted from the Alternate Payee's account after qualification of the Order and segregation of the Alternate Payee's award to a separate account in the Alternate Payee's name. The fee will be taken from the investment options in the applicable account(s) according to the plan level fee method in effect as of the date the fee is deducted.


Brian P Schneider

9/2/14
Date


Kristi A Taylor

9/2/14
Date

Attorney for Alternate Payee:

Elizabeth Rivera

Liz Rivera

209 Jennings

Fort Worth, TX 76104

Attorney for Participant:

Robert Stites


Robert Stites

903 West Weatherford

Fort Worth, TX 76102

Judge of the Court:

Dated: 9-5-2014



Track No: 154173244

322-547540-13

FILED
TARRANT COUNTY
2/6/2014 5:38:04 PM
THOMAS A. WILDER
DISTRICT CLERK

NO. 322-547540-13

IN THE MATTER OF
THE MARRIAGE OF

BRIAN SCHNEIDER
AND
KRISTI SCHNEIDER

AND IN THE INTEREST OF
MATTHEW SCHNEIDER AND
ASHLYN SCHNEIDER, CHILDREN

§ IN THE DISTRICT COURT
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§ 322ND JUDICIAL DISTRICT
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§
§
§ TARRANT COUNTY, TEXAS

MOTION TO EQUALIZE ATTORNEY'S FEES

This Motion to Equalize Attorney's Fees is brought by Kristi Schneider, Respondent, who shows in support:

1. Petitioner has the majority of the financial assets in his possession. Respondent is unable to pay legal fees for legal services that have been performed on behalf of the Respondent in response to request of the Petitioner.

2. By reason of the performance of these legal services and the advancement of these expenses, Respondent has become indebted to pay such fees and expenses reasonable under all the circumstances.

3. As of today's date, there have been two (2) hearings: a Temporary Restraining Order hearing on November 26, 2013 and Temporary Orders Hearing on December 18, 2013. Respondent has been deposed and served with duces tecum. Two depositions have been noticed and conducted by Petitioner. Respondent's deposition was conducted on January 24, 2013 and a second deposition of a non-party was conducted on January 28, 2014. Petitioner has served Respondent with Requests for Production, Request for Disclosure and a Request for Admissions and a pre-trial order has been entered.

Court's Minutes
Transaction #

2008

322-547540-13

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TARRANT COUNTY
2/6/2014 5:38:04 PM
THOMAS A. WILDER
DISTRICT CLERK

4. Respondent has no other means of paying her attorney and requests Petitioner pay her fees out of marital assets or Petitioner's 401K or through any other assets available to Petitioner in order to equalize attorney's fees.

Respondent requests this Court enter an Order authorizing Petitioner to pay such attorney's fees and expenses, any other Orders it deems necessary.


Respectfully submitted,

By: 

ELIZABETH RIVERA
State Bar No. 24051251
209 S. Jennings Avenue
Fort Worth, Texas 76104
Tel: 817.717.3538
Fax: 817.870.2979
E-Mail: lizriveralaw@hotmail.com
Attorney for Respondent

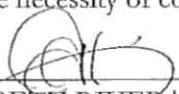
Certificate of Service

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on February 6, 2014.


ELIZABETH RIVERA
Attorney for Respondent

Certificate of Conference

I certify that a conference with held with opposing counsel on January 23, 2014 on the merits of this motion. Counsel agreed on a date to set this matter for February 19, 2014; however, an agreement as the merits was not reached without the necessity of court intervention.


ELIZABETH RIVERA
Attorney for Respondent

322-547540-13

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TARRANT COUNTY
2/6/2014 5:38:04 PM
THOMAS A. WILDER
DISTRICT CLERK

Notice of Hearing

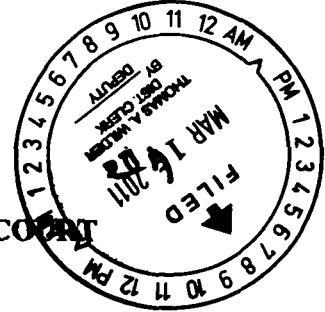
The above motion is set for hearing on February 19, 2014 at 9:00 a.m. in the 322nd Associate Court, 200 East Weatherford St., Fort Worth, Texas 76196.

Signed on 2-7-14.



Judge or Clerk

NO. 360-479099-10



IN THE MATTER OF
THE MARRIAGE OF

LARRY E. DICKERSON
AND
KATHLEEN J. DICKERSON

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IN THE DISTRICT COURT

360TH JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

**MOTION TO RELEASE FUNDS FOR ATTORNEY'S FEES
AND PERSONAL LIVING EXPENSES**

TO THE HONORABLE COURT:

COMES NOW, Petitioner, LARRY E. DICKERSON, and requests that the Court enter an order to release funds in the American Airlines SuperSaver 401(k) Plan in the name of LARRY E. DICKERSON for payment of attorney's fees to SAMUEL M. SANCHEZ and KERRY OWENS and for personal living expenses.

Petitioner requests that the Court order that \$30,000.00 be released from the American Airlines SuperSaver 401(k) and that the parties execute any and all documents necessary to complete said transaction.


Petitioner further requests that the funds be deposited into the CORDELL & CORDELL trust account for disbursement of attorney's fees to SAMUEL M. SANCHEZ and KERRY OWENS and for personal living expenses.

PRAYER

WHEREFORE, Petitioner LARRY E. DICKERSON requests that the Court grant this Motion to Release Funds, all relief requested, and any such other and further relief to which he may be justly entitled.

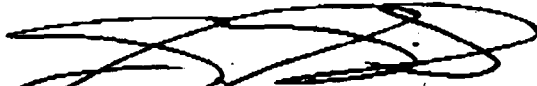
Respectfully submitted,

CORDELL & CORDELL PC
420 Throckmorton, Suite 1010
Fort Worth, Texas 76102
Tel: (817)806-0072
Fax: (817)806-0073

By: 
SAMUEL M. SANCHEZ
State Bar No. 24045241
Attorney for Petitioner

Certificate of Conference

A reasonable effort has been made to resolve the dispute without the necessity of court intervention and the effort failed. Therefore it is presented to the Court for determination.


SAMUEL M. SANCHEZ
Attorney for Petitioner

Certificate of Service

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on March 16, 2011.


SAMUEL M. SANCHEZ
Attorney for Petitioner

Notice of Hearing

The above motion is set for hearing on March 22, 2011 at 8:30 a.m. in the 360th Judicial District Court, Tarrant County Family Courts, 200 E. Weatherford Street, Fort Worth, Texas.

SIGNED on _____

Judge or Clerk

THOMAS A. WILDER - TARRANT COUNTY DISTRICT CLERK
FAX TRANSMITTAL FORM

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Representing: ☒ Plaintiff/Petitioner ☐ Defendant/Respondent ☐ Other

Authorization: I authorize the filing of the below named document(s) and I further authorize my checking account to be debited in accordance with my subscriber's agreement.

Signature: 

Total number of Pages (including this form) 3

Case Number (if not new case) 3100-479099-10

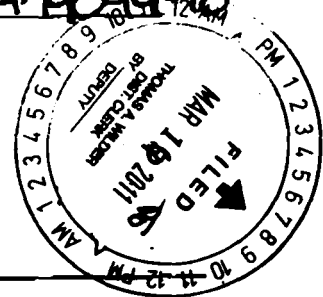
This document should be filed in:

☐ Civil (For Civil or Criminal please send your fax to: 817-850-2928)

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☐ Juvenile



If you ever have a problem, please call Sue at 817-884-1345 or Willie at 817-212-7009.

☐ New Case Filing

☐ Motions and other pleadings WITH FEES:

☒ Motions and other pleadings WITHOUT FEES: Motion to Release Funds For Attorneys Fees & Living Expenses

REQUEST FOR SERVICE DOCUMENTS (Do you want us to issue citations or other documents?)

Type of service document	Name of person to be served	Address	Type of service (constable, Private, certified mail, etc)

CAUSE NO. D-1-FM-08-005770

IN THE MATTER OF THE
MARRIAGE OF

ERIC CHRISTOPHER BEHRENS
AND
SHELBY LEIGH BEHRENS

AND IN THE INTEREST OF
SCARLETT LEIGH BEHRENS,
MINOR CHILD

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IN THE DISTRICT COURT

53rd JUDICIAL DISTRICT

TRAVIS COUNTY, TEXAS

MOTION TO SIGN ADDITIONAL TEMPORARY ORDERS

Comes Now, SHELBY LEIGH BEHRENS (hereinafter “Wife”), and moves the Court to sign the *Order on Respondent’s Motion for Additional Temporary Orders and Interim Attorney’s Fees* attached hereto which have been submitted to Robert Musemeche, attorney for ERIC CHRISTOPHER BEHRENS (hereinafter “Husband”).

I.

The draft of the *Order on Respondent’s Motion for Additional Temporary Orders and Interim Attorney’s Fees* was prepared in accordance with the Court’s ruling of June 3, 2009, and which was further noted on the Court’s docket sheet on that same date. Counsel for Wife sent a copy of the proposed *Order on Respondent’s Motion for Additional Temporary Orders and Interim Attorney’s Fees* to counsel for Husband on June 11, 2009 by electronic mail. On June 12, 2009 counsel for Wife received requested revisions from counsel for Husband. Counsel for Wife accepted several revisions requested by Husband and submitted a revised draft (as attached hereto) to counsel for Husband. As of the filing of this Motion, counsel for Husband and counsel for Wife have not been able to agree upon the form of the Order.

II.

On June 3, 2009, Husband was ordered to obtain a loan or loans for payment of Wife's interim attorney's fees. In connection with this award of interim attorney's fees, Husband was ordered to submit such loan application(s) within 10 days of the June 3, 2009 hearing. Counsel for Husband has represented to counsel for Wife that he was advising Husband to wait to submit such loan application(s) until such time that a written order is in place.

Counsel for Husband has previously indicated his desire to schedule depositions of each party to occur on June 25, 2009. Counsel for Wife has attorney's fees due and owing from Wife in excess of \$35,000.00. Counsel for Wife requests protection pursuant to Tex. R. Civ. P. 192.6(b) and Tex. R. Civ. P. 176.6(e) from moving forward with the depositions on June 25, 2009, and requests that the depositions of the parties be reset to a date and time occurring after Wife's attorney's receipt of the \$50,000.00 interim attorneys' fees from Husband as counsel for Wife cannot continue to incur attorneys fees and advance costs without payment.

PRAYER

WHEREFORE PREMISES CONSIDERED, SHELBY LEIGH BEHRENS requests that the Court grant this Motion in its entirety and sign the *Order on Respondent's Motion for Additional Temporary Orders and Interim Attorney's Fees* prepared by attorneys for Movant.

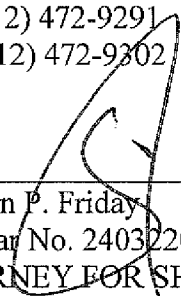
SHELBY LEIGH BEHRENS prays for protection from appearing for any depositions prior to Husband's compliance with the above *Order on Respondent's Motion for Additional Temporary Orders and Interim Attorney's Fees* in whatever form the Court signs.

SHELBY LEIGH BEHRENS prays for and all other relief, in law and in equity, to which she may be entitled.

Respectfully submitted,

FRIDAY, FRIDAY & KAZEN, LLP

Attorneys at Law
700 Lavaca St., Suite 1150
Austin, Texas 78701
Tel: (512) 472-9291
Fax: (512) 472-9302



Jonathan P. Friday
State Bar No. 24032204
ATTORNEY FOR SHELBY BEHRENS

NOTICE OF HEARING

The above motion is set for hearing on Monday, June 22, 2009 at 8:30 a.m. before the Honorable Margaret Cooper at the Travis County Courthouse, 1000 Guadalupe, Austin, Texas 78701.

CERTIFICATE OF SERVICE

I hereby certify, by my signature above, that a true and correct copy of the foregoing document was served upon Robert Musemeche, counsel of record for Petitioner, (via facsimile 1-800-485-1404 and via email to rmusemeche@gmail.com), on this 16th day of June 2009 in accordance with the TEXAS RULES OF CIVIL PROCEDURE.

CAUSE NO. D-1-FM-08-005770

**IN THE MATTER OF THE
MARRIAGE OF**

**ERIC CHRISTOPHER BEHRENS
AND
SHELBY LEIGH BEHRENS**

**AND IN THE INTEREST OF
SCARLETT LEIGH BEHRENS,
MINOR CHILD**

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IN THE DISTRICT COURT

53rd JUDICIAL DISTRICT

TRAVIS COUNTY, TEXAS

**ORDER ON RESPONDENT'S MOTION FOR ADDITIONAL
TEMPORARY ORDERS AND INTERIM ATTORNEY'S FEES**

On June 3, 2009, came on for consideration Respondent's Motion for Additional Temporary Orders and Interim Fees.

I.

Appearances

Petitioner, ERIC CHRISTOPHER BEHRENS, appeared in person and through attorney of record, Robert Musemeche, and announced ready.

Respondent, SHELBY LEIGH BEHRENS, appeared in person and through attorneys of record, Jonathan P. Friday and Philip C. Friday, Jr., and announced ready.

II.

Record

The record of testimony was duly reported by Betty Ehlers, a court reporter for the 201st Judicial District Court, Travis County, Texas.

III.

Jurisdiction

The Court, after examining the record and hearing the evidence and argument of counsel, finds that the Court has jurisdiction of this case and of all the parties.

IV.

Request for Temporary Support

Respondent's request for additional temporary support is DENIED.

V.

Request for Interim Attorney's Fees

The Court FINDS that Respondent's request for interim attorney's fees is reasonable and should be GRANTED.

ERIC CHRISTOPHER BEHRENS is ORDERED to use his best efforts to obtain a loan, whether one or more, in the total aggregate amount of \$50,000 on such terms as are commercially reasonable, for payment of SHELBY LEIGH BEHRENS' interim attorney's fees. ERIC CHRISTOPHER BEHRENS is specifically ORDERED and thereby authorized to take all reasonable steps necessary to obtain said loan from any and all sources available to him, including personal loans, home equity loans, retirement account loans, credit lines, and the like; and any and all assets of the parties may be used to collateralize said loan, as necessary, including the 401k retirement account of the parties. SHELBY LEIGH BEHRENS shall fully cooperate with ERIC CHRISTOPHER BEHRENS, if and as directed, in obtaining any such loan(s) and SHELBY LEIGH BEHRENS shall personally guarantee the loan(s) and shall be severally obligated on the loan documents, as necessary. ERIC CHRISTOPHER BEHRENS is ORDERED to apply for such loan(s), as ordered herein, on or before June 24, 2009, and shall continue to make such application(s) for the loan, if not approved, for an additional period of 30 days. Upon receipt of the loan proceeds, ERIC CHRISTOPHER BEHRENS is ORDERED to immediately deliver said proceeds to Jonathan P. Friday of FRIDAY, FRIDAY & KAZEN, LLP at 700 Lavaca, Suite 1150, Austin, Texas 78701, (the "law firm") where the monies shall be deposited into the law firm's IOLTA account and held in trust for the use of interim attorney's

fees and direct litigation costs of SHELBY BEHRENS in this divorce case. At the conclusion of the case, any unearned monies shall be remitted from the law firm's IOLTA account directly to ERIC CHRISTOPHER BEHRENS within 30 days for the sole purpose of paying down any portion of the current or past due balance of the loan(s). IT IS ORDERED that upon final division of property, the loan made the basis of this Order, (whether one or more) together with all loan origination fees and accrued interest attributable to the loan(s) shall be assessed against SHELBY LEIGH BEHRENS in division of the community estate of the parties and/or against her claims for separate property.

VI.

Date of Order

These orders PRONOUNCED AND RENDERED in open court on June 3, 2009, and noted on the Court's docket sheet on that same date, and ministerially SIGNED on the ____ day of June 2009.

Honorable Margaret A. Cooper

APPROVED AS TO FORM:
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700 Lavaca St., Suite 1150
Austin, TX 78701
Tel: (512) 472-9291
Fax: (512) 472-9302

Jonathan P. Friday
State Bar No. 24032204
ATTORNEY FOR SHELBY BEHRENS

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State Bar No. 14744900
ATTORNEY FOR ERIC BEHRENS